

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

No. 17-cv-00045-S-PAS

ELIZABETH CRABTREE,
PLAINTIFF,

VS.

BROWN UNIVERSITY,
DEFENDANT

PLAINTIFF'S RULE 16(b) CONFERENCE MEMORANDUM

Summary of Factual Allegations. Plaintiff Elizabeth Crabtree was employed by Defendant Brown University for approximately thirteen years, most recently as Assistant Vice President for Strategy & Resource Development, Division of Advancement, Brown University. Plaintiff consistently earned excellent performance reviews, salary increases, and performance bonuses. In December 2012 Patricia Watson was appointed Senior Vice President for University Advancement and became Plaintiff's direct supervisor. Shortly thereafter Plaintiff's duties were considerably expanded without any corresponding increase in salary.

When Plaintiff learned that her compensation was not comparable to male peers in the Division of Advancement, she requested a formal review. Plaintiff made repeated requests to the Senior Vice President to address her claims of discrimination, but the Senior Vice President failed to take any action to address these claims.

From January through March 2016 Plaintiff addressed her concerns with other high ranking university officials, including the Chief University Auditor, Vice President for Human Resources, and University Ombudsperson.

While in the process of preparing to request that a formal internal EEOC investigation be opened, Plaintiff was unilaterally terminated by the Senior Vice President on Friday, March 4,

2016. In announcing Plaintiff's departure, the Senior Vice President touted Plaintiff's exemplary performance over thirteen (13) years. The Senior Vice President characterized Plaintiff's termination as a position elimination and layoff.

Plaintiff believes that her discharge was a retaliation for her claims of unequal treatment, as, at the time of her layoff there were no fewer than thirty (30) open positions in the Division of Advancement for which she met or exceeded all qualifications. Approximately twenty (20) days after Plaintiff's layoff, Defendant posted a position for Assistant Vice President for Advancement Communications with a job description for which Plaintiff met or exceeded all requirements.

Plaintiff anticipates that the evidence will show that her performance was exemplary and that her termination was retaliation for her efforts to obtain compensation comparable to male employees with similar (or even less) responsibilities and duties. Despite consistent effort since her termination, Plaintiff has been unable to obtain comparable employment.

Plaintiff's Claims. Plaintiff asserts claims under the Age Discrimination in Employment Act, ADEA, 29 U.S.C. sec. 621 *et seq.*; Title VII of the Civil Rights Act of 1964, 42 U.S.C. sec. 2000 *et seq.*; and Rhode Island Fair Employment Practices Act, R.I. Gen. L. sec. 28-5-1 *et seq.* Plaintiff seeks compensatory and punitive damages, and attorneys' fees.

Significant Legal Issues that May Arise. Plaintiff anticipates that the issues at trial will be largely based on factual, not legal disputes between the parties.

RESPECTFULLY SUBMITTED
PLAINTIFF
ELIZABETH CRABTREE
By her Attorneys:

/s/ Kathleen M. Hagerty

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Date: August 1, 2017

/s/ Thomas More Dickinson

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CERTIFICATION

I hereby certify that the within document was served on all parties entitled thereto via this Court's electronic filing system.

/s/ Thomas More Dickinson

Date: August 1, 2017